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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

18 | IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 3:07-cv-05944-SC

MDL No. 1917

This Document Relates to:

20 | Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al.,
21 | No. 11-cv-05513

**DECLARATION OF CLAIRE YAN IN
SUPPORT OF DEFENDANTS'
ADMINISTRATIVE MOTION TO SEAL**

22 | Best Buy Co., et al. v. Technicolor SA, et al.,
23 | No. 13-cv-05264

[Administrative Motion to Seal and [Proposed] Order filed concurrently herewith]

24 *Sears, Roebuck and Co. and Kmart Corp. v. Technicolor SA*, No. 3:13-cv-05262

Judge: Hon. Samuel Conti
Date: None Set
Ctrm: 1 17th Floor

26 *Sears, Roebuck and Co. and Kmart Corp. v.*
27 *Chunghwa Picture Tubes, Ltd.*, No. 11-cv-
05514

1 *Sharp Electronics Corp., et al. v. Hitachi Ltd.,*
2 *et al.*, No. 13-cv-1173

3 *Sharp Electronics Corp., et al. v. Koninklijke*
4 *Philips Elecs., N.V., et al.*, No. 13-cv-2776

5 *Siegel v. Hitachi, Ltd.*, No. 11-cv-05502

6 *Siegel v. Technicolor SA*, No. 13-cv-05261

7 *Target Corp. v. Chunghwa Picture Tubes,*
8 *Ltd.*, No. 11-cv-05514

9 *Target Corp. v. Technicolor SA*, No. 13-cv-
05686

10 *ViewSonic Corporation v. Chunghwa Picture*
11 *Tubes Ltd.*, No. 14-cv-2510

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I, Claire Yan, declare:

1. I am an attorney with the law firm Munger, Tolles & Olson LLP, counsel of record for Defendant LG Electronics, Inc. (“LGE”) in the above entitled action. I am licensed in the State of California and admitted to practice before this Court. I make this declaration based on my personal knowledge and, if called upon as a witness, could and would testify competently as to the matters set forth below.

2. Pursuant to Civil Local Rule 7-11 and 79-5, I make this declaration in support of the LGE Defendants' Administrative Motion to Seal.

3. LG seeks permission to file under seal the highlighted portions of the sealed version of Defendants' Reply in Support of Motion *In Limine* No. 8 to Exclude Evidence or Argument Relating to Damages From "Spillover" or "Ripple" Effects of Foreign Price-Fixing Activities on U.S. Prices.

4. Highlighted portions referenced above contain discussion, analysis, references to, or information taken directly from, material designated by a Party in this matter as "HIGHLY CONFIDENTIAL" under the Stipulated Protective Order (Dkt. No. 306) in this case.

5. LGE seeks to submit the above material under seal in good faith in order to comply with the Stipulated Protective Order in this action and the applicable Local Rules. Because the information LGE seeks to submit under seal has been designated as Highly Confidential by other parties, LGE is filing the accompanying Administrative Motion, and will be prepared to file an unredacted version of the above-referenced documents in the public record if required by Civil Local Rule 79-5(e).

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on March 6, 2015, in Los Angeles, California.

/s/ Claire Yan
CLAIRES YAN